

EXHIBIT A

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American Arbitration Association
Dispute Resolution Services Worldwide

Dispute Resolution ARBITRATION RULES

(ENTER THE NAME OF THE APPLICABLE RULES)

Demand for Arbitration

MEDIATION: If you would like the AAA to contact the other parties and attempt to arrange mediation, please check this box. <input type="checkbox"/> There is no additional administrative fee for this service.					
Name of Respondent MGM Mirage; Turnberry/MGM Grand Towers, LLC; (continued below)			Name of Representative (if known) Steve Morris, Esq.		
Turnberry/Harmon Ave., LLC; Turnberry West Realty, Inc.;			Name of Firm (if applicable): Morris Peterson		
MGM Grand Condominiums, LLC; The Signature Condominiums, LLC			Representative's Address 300 South Fourth Street		
City	State	Zip Code	City	State	Zip Code
			Las Vegas	NV	89101
Phone No.		Fax No.	Phone No.		Fax No.
			(702) 474-9400		(702) 474-9422
Email Address:			Email Address: SM@morrislawgroup.com		
The named claimant, a party to an arbitration agreement dated _____, which provides for arbitration under the _____ Arbitration Rules of the American Arbitration Association, hereby demands arbitration.					
THE NATURE OF THE DISPUTE This is a CLASS ACTION seeking certification of the case to proceed and be adjudicated as a class action of the claims set forth in the Amended Complaint attached hereto as EXHIBIT "1".					
Dollar Amount of Claim \$ Excess of \$10,000,000			Other Relief Sought: <input checked="" type="checkbox"/> Attorneys Fees <input checked="" type="checkbox"/> Interest <input checked="" type="checkbox"/> Arbitration Costs <input checked="" type="checkbox"/> Punitive/ Exemplary <input checked="" type="checkbox"/> Other Rescission		
Amount Enclosed \$2,500.00 In accordance with Fee Schedule: <input checked="" type="checkbox"/> Flexible Fee Schedule <input type="checkbox"/> Standard Fee Schedule					
PLEASE DESCRIBE APPROPRIATE QUALIFICATIONS FOR ARBITRATOR(S) TO BE APPOINTED TO HEAR THIS DISPUTE: Former District Attorney or former U.S. Attorney.					
Hearing locale <u>Las Vegas, NV</u> (check one) <input type="checkbox"/> Requested by Claimant <input checked="" type="checkbox"/> Locale provision included in the contract					
Estimated time needed for hearings overall: _____ hours or _____ days			Type of Business: Claimant <u>Individual Investors</u> Respondent <u>Developer/Owner of Hotels Worldwide</u>		
Is this a dispute between a business and a consumer? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			Does this dispute arise out of an employment relationship? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If this dispute arises out of an employment relationship, what was/is the employee's annual wage range? Note: This question is required by California law. <input type="checkbox"/> Less than \$100,000 <input type="checkbox"/> \$100,000 - \$250,000 <input type="checkbox"/> Over \$250,000					
You are hereby notified that copies of our arbitration agreement and this demand are being filed with the American Arbitration Association's Case Management Center, located in (check one) <input type="checkbox"/> Atlanta, GA <input type="checkbox"/> Dallas, TX <input type="checkbox"/> East Providence, RI <input checked="" type="checkbox"/> Fresno, CA <input type="checkbox"/> International Centre, NY, with a request that it commence administration of the arbitration. Under the rules, you may file an answering statement within the timeframe specified in the rules, after notice from the AAA.					
Signature (may be signed by a representative) <u>Robert B. Gerard</u>			Date: <u>8-31-09</u>		
Name of Claimant Mary Ann Sussex (on behalf of herself and the CLASS)			Name of Representative Robert B. Gerard, Esq.		
Address (to be used in connection with this case): c/o Gerard and Associates; 2840 South Jones Blvd., Bldg. D, Unit 4			Name of Firm (if applicable) Gerard and Associates		
City Las Vegas			Representative's Address: 2840 South Jones Blvd. Bldg. D, Unit 4		
State NV	Zip Code 89146	City Las Vegas	State NV	Zip Code 89146	
Phone No. (702) 251-0093	Fax No. (702) 251-0094	Phone No. (702) 251-0093	Fax No. (702) 251-0094		
Email Address: rgerard@gerardlaw.com; rehmann@gerardlaw.com			Email Address: rgerard@gerardlaw.com		
To begin proceedings, please send two copies of this Demand and the Arbitration Agreement, along with the filing fee as provided for in the Rules, to the AAA. Send the original Demand to the Respondent.					
Please visit our website at www.adr.org if you would like to file this case online. AAA Customer Service can be reached at 800-778-7879					

American Arbitration Association

ADDENDUM TO DEMAND FOR CLASS ARBITRATION

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AAA File No. _____

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Counsel for Claimants

PROCEDURAL BACKGROUND

Original Complaint against Respondents was filed on February 22, 2008, in the Eighth Judicial District, Clark County, Nevada (Case No. A557730). The dispute between the parties focuses primarily on allegations of securities law violations in the sale and marketing of condo-hotel units at the Signature at MGM Grand Hotel, located in Las Vegas, Nevada. The Complaint was amended to include class allegations on May 7, 2008. Respondents removed the action to U.S. Federal District Court, District of Nevada, on June 13, 2008 (Case No. 2:08-cv-00773). Claimants filed an Amended Class Action Complaint on July 2, 2008, which added federal claims under the Securities Act of 1933 and 1934 to the previously asserted seven state law claims. Claimants (Mary Ann Sussex, Mitchell Pae, Malcolm Nicholl, Sandy Scalise, Ernesto Valdez, Sr., Ernesto Valdez, Jr., John Hanson, Elizabeth Hanson, Andres F. Alos, Martha Vias, Charles Crooks, Laura Crooks, Sampal Family Revocable Living Trust, Daniel Reich, Natalie Reich, Jose Sanchez, Linda S. Corbridge, Fouad Feghali, Basilios C. Petrakis, Ronald D. Perkins) adopt the Amended Federal Class Action Complaint filed in this matter on July 2, 2008 (Attached as Exhibit "1"). On July 17, 2008, Respondents filed a Motion to Compel Arbitration based on an arbitration clause included in the Signature at MGM Grand Purchase and Sale Agreement executed by each claimant (Purchase and Sale Agreement attached as Exhibit "2"). Claimants opposed said Motion to Compel Arbitration based upon state law theories of procedural and substantive unconscionability. On April 6, 2009, a federal Magistrate Judge denied Respondents' Motion to Compel Arbitration (Magistrate's Order attached as Exhibit "3"). On April 22, 2009, the Nevada Supreme Court in a related action determined the arbitration clause to be valid and enforceable (Nevada Supreme Court Order attached as Exhibit "4"). On June 16, 2009, the U.S. District Court reversed the Magistrate Order (U.S. District Court Order attached as Exhibit "5"). The following causes of action are alleged against Respondents: (1) Violation of the Securities Act of 1933, (2) Violation of the Securities Exchange Act of 1934, (3) Violation of N.R.S. 90.460, (4) Violation of N.R.S. 90.570, (5) Violation of N.R.S. 598, *et seq.* (6) Fraudulent Misrepresentation, (7) Negligent Misrepresentation, (8) Fraud in the Inducement, (9) Fraudulent Concealment.